

November 23, 2015

*VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED*

Granite Rock Company Peninsula Concrete  
Attention: John Seith, Branch Manager  
355 Blomquist Street  
Redwood City, California 94063

Agent for Service of Process for  
Granite Rock Company  
Kevin Jeffery  
350 Technology Drive  
Watsonville, California 95076

Granite Rock Company  
Attention: Tom Squeri, President & CEO  
P.O. Box 50001  
Watsonville, California 95077

**Re: Notice of Violation and Intent to File Suit under the Clean Water Act**

Dear Sirs:

I am writing on behalf of San Francisco Baykeeper ("Baykeeper") to give notice that Baykeeper intends to file a civil action against Granite Rock Company ("Granite Rock") for violations of the Federal Water Pollution Control Act, 33 U.S.C. § 1251 *et seq.* ("Clean Water Act" or "CWA") at Granite Rock Peninsula Concrete, located at 355 Blomquist Street in Redwood City, California (the "Facility").

Baykeeper is a non-profit public benefit corporation organized under the laws of California, with its office in Oakland, California. Baykeeper's purpose is to protect and enhance the water quality and natural resources of San Francisco Bay, its tributaries, and other waters in the Bay Area, for the benefit of its ecosystems and communities. Baykeeper has over three thousand members who use and enjoy San Francisco Bay and other waters for various recreational, educational, and spiritual purposes. Baykeeper's members' use and enjoyment of these waters are negatively affected by the pollution caused by Granite Rock's operations.

This letter addresses Granite Rock's unlawful discharge of pollutants from the Facility via stormwater into San Francisco Bay. Specifically, Baykeeper's investigation of the Facility has uncovered significant, ongoing, and continuous violations of the CWA and the General Industrial Stormwater Permit issued by the State of California (NPDES General Permit No. CAS000001 [State Water Resources Control Board] Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ ("1997 Permit") and by



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Order No. 2014-0057-DWQ (“2015 Permit”) (collectively, the “Industrial Stormwater Permit”).<sup>1</sup>

CWA section 505(b) requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), a citizen must give notice of his or her intent to file suit. 33 U.S.C. § 1365(b). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency (“EPA”), and the State in which the violations occur. As required by section 505(b), this Notice of Violation and Intent to File Suit provides notice to Granite Rock of the violations that have occurred and which continue to occur at the Facility. After the expiration of sixty (60) days from the date of this Notice of Violation and Intent to File Suit, Baykeeper intends to file suit in federal court against the City under CWA section 505(a) for the violations described more fully below.

During the 60-day notice period, Baykeeper is willing to discuss effective remedies for the violations noticed in this letter. We suggest that Granite Rock contact us within the next twenty (20) days so that these discussions may be completed by the conclusion of the 60-day notice period. Please note that we do not intend to delay the filing of a complaint in federal court, even if discussions are continuing when the notice period ends.

## **I. THE LOCATION OF THE ALLEGED VIOLATIONS**

### **A. The Facility**

Granite Rock operates a concrete batch plant located at 355 Blomquist Street in Redwood City, California (the “Facility”). At the Facility, Granite Rock manufactures ready-mix concrete, which is loaded into mixer trucks for use off site. Granite Rock also operates a roofed truck shop and on-site diesel fueling station. Potential pollutants from the Facility include pH, total suspended solids (“TSS”), heavy metals, Portland cement, flyash, aggregate (sand/gravel), chemical admixtures, liquid additives, oil and grease, diesel, hydraulic oil, lubricants, solvents, antifreeze, brake fluid, transmission fluid, welding material, polycyclic aromatic hydrocarbons (“PAHs”), and other pollutants. The Facility is adjacent to Redwood Creek, and is located just south of the Bair Island Ecological Reserve and portions of the Don Edwards National Wildlife Refuge in Redwood City. Stormwater from the Facility discharges to the municipal storm drains adjacent to the driveways on Blomquist Street, and ultimately drains to San Francisco Bay.

### **B. The Affected Water**

San Francisco Bay is a water of the United States. The CWA requires that water bodies such as San Francisco Bay meet water quality objectives that protect specific

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<sup>1</sup> On April 1, 2014, the State Water Resources Control Board adopted 2015 Permit. As of July 1, 2015, the 2015 Permit superseded the 1997 Permit except for the purpose of enforcing violations of the 1997 Permit. 2015 Permit, Section I.A. (Finding 6).

“beneficial uses.” The beneficial uses of San Francisco Bay and its tributaries include commercial and sport fishing, estuarine habitat, fish migration, navigation, preservation of rare and endangered species, water contact and non-contact recreation, shellfish harvesting, fish spawning, and wildlife habitat. Contaminated stormwater from the Facility adversely affects the water quality of the San Francisco Bay watershed and threatens the beneficial uses and ecosystem of this watershed, which includes habitat for threatened and endangered species.

## **II. THE FACILITY’S VIOLATIONS OF THE CLEAN WATER ACT**

It is unlawful to discharge pollutants to waters of the United States, such as San Francisco Bay and its tributaries, without an NPDES permit or in violation of the terms and conditions of an NPDES permit. CWA § 301(a), 33 U.S.C. § 1311(a); *see also* CWA § 402(p), 33 U.S.C. § 1342(p) (requiring NPDES permit issuance for the discharge of stormwater associated with industrial activities). The Industrial Stormwater Permit authorizes certain discharges of stormwater, conditioned on compliance with its terms.

On or around November 23, 1992, Granite Rock submitted a Notice of Intent (“NOI”) to be authorized to discharge stormwater from the Facility under the Industrial Stormwater Permit. On or around June 9, 2015, Granite Rock submitted an NOI to be authorized to discharge stormwater from the Facility under the 2015 Permit. However, information available to Baykeeper indicates that stormwater discharges from the Facility have violated several terms of the Industrial Stormwater Permit and the CWA. Apart from discharges that comply with the Industrial Stormwater Permit, the Facility lacks NPDES permit authorization for any other discharges of pollutants into waters of the United States.

### **A. Discharges in Excess of BAT/BCT Levels**

The Effluent Limitations of the Industrial Stormwater Permit prohibit the discharge of pollutants from the Facility in concentrations above the level commensurate with the application of best available technology economically achievable (“BAT”) for toxic pollutants<sup>2</sup> and best conventional pollutant control technology (“BCT”) for conventional pollutants.<sup>3</sup> 1997 Permit, Order Part B.3.; 2015 Permit, Section X.H. EPA has published Benchmark values set at the maximum pollutant concentration levels present if an industrial facility is employing BAT and BCT, as listed in Attachment 1 to this letter.<sup>4</sup> The 2015 Permit incorporates these Benchmark values as “Numeric Action Levels.” 2015 Permit, Section I.M. (Finding 62).

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<sup>2</sup> BAT is defined at 40 C.F.R. § 442.23. Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

<sup>3</sup> BCT is defined at 40 C.F.R. § 442.22. Conventional pollutants are listed at 40 C.F.R. § 401.16 and include BOD, TSS, oil and grease, pH, and fecal coliform.

<sup>4</sup> The Benchmark values are part of EPA’s Multi-Sector General Permit (“MSGP”) and can be found at: <http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm>. The most recent sector-specific Benchmarks can be found at:

Granite Rock's self-reported exceedances of Benchmark values over the last five (5) years, identified in Attachment 2 to this letter, indicate that Granite Rock has failed and is failing to employ measures that constitute BAT and BCT in violation of the requirements of the Industrial Stormwater Permit. Baykeeper alleges and notifies Granite Rock that its stormwater discharges from the Facility have consistently contained and continue to contain levels of pollutants that exceed Benchmark values for TSS, pH, and iron.

Granite Rock's ongoing discharges of stormwater containing levels of pollutants above EPA Benchmark values and BAT- and BCT-based levels of control also demonstrate that Granite Rock has not developed and implemented sufficient Best Management Practices ("BMPs") at the Facility. Proper BMPs could include, but are not limited to, moving certain pollution-generating activities under cover or indoors, capturing and effectively filtering or otherwise treating all stormwater prior to discharge, frequent sweeping to reduce the build-up of pollutants on-site, installing filters in downspouts and storm drains, and other similar measures.

Granite Rock's failure to develop and/or implement adequate pollution controls to meet BAT and BCT at the Facility violates and will continue to violate the CWA and the Industrial Stormwater Permit each and every day Granite Rock discharges stormwater without meeting BAT/BCT. Baykeeper alleges that Granite Rock has discharged stormwater containing excessive levels of pollutants from the Facility to San Francisco Bay during at least every significant local rain event over 0.1 inches in the last five (5) years.<sup>5</sup> Attachment 3 compiles all dates in the last five (5) years when a significant rain event occurred. Granite Rock is subject to civil penalties for each violation of the Industrial Stormwater Permit and the CWA within the past five (5) years.

## **B. Discharges Impairing Receiving Waters**

The Industrial Stormwater Permit's Discharge Prohibitions disallow stormwater discharges that cause or threaten to cause pollution, contamination, or nuisance. *See* 1997 Permit, Order Part A.2.; 2015 Permit, Sections III.C., VI.C. The Industrial Stormwater Permit also prohibits stormwater discharges to surface or groundwater that adversely impact human health or the environment. 1997 Permit, Order Part C.1.; 2015 Permit, Section VI.B. Receiving Water Limitations of the Industrial Stormwater Permit prohibit stormwater discharges that cause or contribute to an exceedance of applicable Water Quality Standards ("WQS"). 1997 Permit, Order Part C.2.; 2015 Permit, Section VI.A. Applicable WQS are set forth in the California Toxics Rule ("CTR")<sup>6</sup> and Chapter

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[http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2015\\_part8.pdf](http://water.epa.gov/polwaste/npdes/stormwater/upload/msgp2015_part8.pdf) ("2015 MSGP"). SIC Code 3273 is covered under Sector E in the 2015 MSGP.

<sup>5</sup> Significant local rain events are reflected in the rain gauge data available at: <http://www.ncdc.noaa.gov/cdo-web/search>.

<sup>6</sup> The CTR is set forth at 40 C.F.R. § 131.38 and is explained in the Federal Register preamble accompanying the CTR promulgation set forth at 65 Fed. Reg. 31,682 (May 18, 2000).

3 of the San Francisco Bay Basin (Region 2) Water Quality Control Plan ("Basin Plan").<sup>7</sup> See Attachment 1. Exceedances of WQS are violations of the Industrial Stormwater Permit, the CTR, and the Basin Plan.

The Basin Plan establishes WQS for San Francisco Bay and its tributaries, including but not limited to the following:

- Waters shall not contain substances in concentrations that result in the deposition of material that cause nuisance or adversely affect beneficial uses.
- Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.
- Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases from normal background light penetration or turbidity relatable to waste discharge shall not be greater than 10 percent in areas where natural turbidity is greater than 50 NTU.
- All waters shall be maintained free of toxic substances in concentrations that are lethal to or that produce other detrimental responses in aquatic organisms.
- Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use. The Basin Plan, Table 3-3, identifies specific marine water quality objectives for toxic pollutants.<sup>8</sup>

Baykeeper alleges that Granite Rock's stormwater discharges have caused or contributed to exceedances of the Receiving Water Limitations in the Industrial Stormwater Permit and the WQS set forth in the Basin Plan. These allegations are based on Granite Rock's self-reported data submitted to the San Francisco Bay Regional Water Quality Control Board. The sampling results indicate that the City's discharges are causing or threatening to cause pollution, contamination, and/or nuisance; adversely impact human health or the environment; and violate applicable WQS. For example, Granite Rock's sampling results indicate exceedances of numeric WQS for pH. See Attachment 2.

Baykeeper alleges that each day that Granite Rock has discharged stormwater from the Facility, Granite Rock's stormwater has contained levels of pollutants that exceeded one or more of the Receiving Water Limitations and/or applicable WQS in San

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<sup>7</sup> The Basin Plan is published by the San Francisco Bay Regional Water Quality Control Board at: [http://www.waterboards.ca.gov/sanfranciscobay/basin\\_planning.shtml#2004basinplan](http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml#2004basinplan).

<sup>8</sup> Basin Plan, Table 3-3 is available at: [http://www.waterboards.ca.gov/rwqcb2/water\\_issues/programs/planningtmdls/basinplan/web/tab/tab\\_3-03.pdf](http://www.waterboards.ca.gov/rwqcb2/water_issues/programs/planningtmdls/basinplan/web/tab/tab_3-03.pdf).



Francisco Bay. Baykeeper alleges that Granite Rock has discharged stormwater exceeding Receiving Water Limitations and/or WQS from the Facility to San Francisco Bay during at least every significant local rain event over 0.1 inches in the last five (5) years. *See* Attachment 3. Each discharge from the Facility that violates a Receiving Water Limitation or has caused or contributed, or causes or contributes, to an exceedance of an applicable WQS constitutes a separate violation of the Industrial Stormwater Permit and the CWA. Granite Rock is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA within the last five (5) years.

### **C. Failure to Develop and Implement an Adequate Storm Water Pollution Prevention Plan**

The Industrial Stormwater Permit requires dischargers to develop and implement an adequate Storm Water Pollution Prevention Plan (“SWPPP”). 1997 Permit, Section A.1.a. and Order Part E.2.; 2015 Permit, Sections I.I. (Finding 54), X.B. The Industrial Stormwater Permit also requires dischargers to make all necessary revisions to existing SWPPPs promptly. 1997 Permit, Order Part E.2.; 2015 Permit, Section X.B.

The SWPPP must include, among other requirements, the following: a site map, a list of significant materials handled and stored at the site, a description and assessment of all potential pollutant sources, a description of the BMPs that will reduce or prevent pollutants in stormwater discharges, and specifications of BMPs designed to reduce pollutant discharge to BAT and BCT levels. 1997 Permit, Sections A.1-A.10.; 2015 Permit, Section X. Moreover, the Industrial Stormwater Permit requires dischargers to evaluate and revise SWPPPs to ensure they meet these minimum requirements, in particular that the necessary BMPs are in place and being implemented. *See* 1997 Permit, Section A.9. (requiring a comprehensive site compliance evaluation completed each reporting year, and revisions to the SWPPP implemented within 90 days after the evaluation); 2015 Permit, Section X.D.2.a. (obligating the discharger to “ensure its SWPPP is developed, implemented and revised as necessary to be consistent with any applicable municipal, state, and federal requirements that pertain to the requirements in [the 2015 Permit].”). Additionally, the Industrial Stormwater Permit requires that Granite Rock assess its stormwater sampling data and identify any additional parameters, beyond those explicitly required, that indicate the presence of pollutants in industrial stormwater. *See* 1997 Permit, Section Section B.5.c.ii.; 2015 Permit, Section X.G.2.d.

Based on information available to Baykeeper, Granite Rock has failed to prepare and/or implement an adequate SWPPP and/or to revise the SWPPP to satisfy each of the requirements of the Industrial Stormwater Permit. For example, Granite Rock’s past and/or current SWPPP has not/does not include and/or Granite Rock has not implemented adequate BMPs designed to reduce pollutant levels in discharges to BAT and BCT levels in accordance with the Industrial Stormwater Permit, as evidenced by the data in Attachment 2.

Accordingly, Granite Rock has violated the CWA each and every day that it has failed to develop and/or implement an adequate SWPPP meeting all of the requirements

of the Industrial Stormwater Permit, and Granite Rock will continue to be in violation every day until it develops and implements an adequate SWPPP. Granite Rock is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring within the past five (5) years.

#### **D. Failure to Properly Sample and Report Stormwater Discharges**

Granite Rock is also in violation of the Industrial Stormwater Permit because it has been collecting stormwater samples that do not adequately reflect pollution coming from its industrial activities. Section B.7.a. of the 1997 Permit required Granite Rock to “collect samples of stormwater discharges from all drainage areas that represent the quality and quantity of the facility’s storm water discharges.” Section B.5.c.ii. of the 1997 Permit required facilities to sample for “[t]oxic chemicals and other pollutants that are likely to be present in storm water discharges in significant quantities.” Section B.5.c.iii. of the 1997 Permit and Section XI.B.6. of the 2015 Permit require facilities to sample for specific analytical parameters based on their standard industrial classification (“SIC”) Code. Facilities that fall into SIC Code 327X, concrete, gypsum, plaster products, are required to analyze their stormwater discharges for iron. Granite Rock self-classified the Facility under SIC Code 3273, ready-mixed concrete, but has failed to consistently test its samples for iron and thus has failed to comply with Sections B.5.c. and B.7.a. of the 1997 Permit and Section XI.B.6. of the 2015 Permit.

Furthermore, the Industrial Stormwater Permit requires a minimum number of sampling events per wet season, with limited exceptions. 1997 Permit, Section B.5; 2015 Permit, Section XI.B.2. Yet Granite Rock has failed to consistently sample and analyze at least two stormwater discharges from the Facility during the past five (5) years. Granite Rock reported the following sampling events: one storm event during the 2010-2011 wet season, zero storm events during the 2011-2012 wet season, and one storm event during the 2013-2014 wet season.

As a result of Granite Rock’s failure to properly sample and report stormwater discharges from its Facility, Granite Rock has been in daily and continuous violation of the Industrial Stormwater Permit and the CWA each and every day for the past five (5) years. These violations are ongoing. Granite Rock will continue to be in violation of the sampling requirements each day that Granite Rock fails to adequately develop and/or implement an effective sampling program at the Facility. Granite Rock is subject to penalties for each violation of the Industrial Stormwater Permit and the CWA occurring for the last five (5) years.

#### **E. Unpermitted Discharges**

Section 301(a) of the CWA prohibits the discharge of any pollutant into waters of the United States unless the discharge is authorized by a NPDES permit issued pursuant to section 402 of the CWA. *See* 33 U.S.C. §§ 1311(a), 1342. Granite Rock sought coverage for the Facility under the Industrial Stormwater Permit, which states that any discharge from an industrial facility not in compliance with the Industrial Stormwater

Permit “must be either eliminated or permitted by a separate NPDES permit.” 1997 Permit, Order Part A.1.; *see also* 2015 Permit, Sections I.A. (Finding 8) and I.C. (Finding 28).

Because Granite Rock has not obtained coverage under a separate NPDES permit and has failed to eliminate discharges not permitted by the Industrial Stormwater Permit, each and every discharge from the Facility described herein not in compliance with the Industrial Stormwater Permit has constituted and will continue to constitute a discharge without CWA permit coverage in violation of section 301(a) of the CWA, 33 U.S.C. § 1311(a).

#### **IV. PERSON RESPONSIBLE FOR THE VIOLATIONS**

Granite Rock Company is the person responsible for the violations at the Facility described above.

#### **V. NAME AND ADDRESS OF NOTICING PARTY**

San Francisco Baykeeper  
1736 Franklin Street, Suite 800  
Oakland, CA 94612  
(510) 735-9700

#### **VI. COUNSEL**

Baykeeper is represented by the following counsel in this matter, to whom all communications should be directed:

Nicole C. Sasaki, Associate Attorney  
George Torgun, Managing Attorney  
San Francisco Baykeeper  
1736 Franklin Street, Suite 800  
Oakland, CA 94612  
(510) 735-9700

Nicole C. Sasaki: (510) 735-9700 x110, [nicole@baykeeper.org](mailto:nicole@baykeeper.org)  
George Torgun: (510) 735-9700 x105, [george@baykeeper.org](mailto:george@baykeeper.org)

#### **VII. REMEDIES**

Baykeeper intends, at the close of the 60-day notice period or thereafter, to file a citizen suit under CWA section 505(a) against Granite Rock for the above-referenced violations. Baykeeper will seek declaratory and injunctive relief to prevent further CWA violations pursuant to CWA sections 505(a) and (d), 33 U.S.C. § 1365(a) and (d), and such other relief as permitted by law. In addition, Baykeeper will seek civil penalties pursuant to CWA section 309(d), 33 U.S.C. § 1319(d), and 40 C.F.R. § 19.4, against



Granite Rock in this action. The CWA imposes civil penalty liability of up to \$37,500 per day per violation for violations occurring after January 12, 2009. 33 U.S.C. § 1319(d); 40 C.F.R. § 19.4. Baykeeper will seek to recover attorneys' fees, experts' fees, and costs in accordance with CWA section 505(d), 33 U.S.C. § 1365(d).

As noted above, Baykeeper is willing to meet with you during the 60-day notice period to discuss effective remedies for the violations noted in this letter. Please contact me or George Torgun to initiate these discussions.

Sincerely,



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Nicole C. Sasaki  
Associate Attorney  
San Francisco Baykeeper

Cc:

Gina McCarthy, Administrator  
U.S. Environmental Protection Agency  
Mail Code: 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Jared Blumenfeld, Regional Administrator  
U.S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Bruce Wolfe, Executive Officer  
Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Thomas Howard, Executive Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



**Attachment 1: EPA Benchmarks and  
Water Quality Standards for Discharges to Saltwater**

**A. EPA Benchmarks, 2000 and 2015  
Multi-Sector General Permit ("MSGP")**

<b>Parameter</b>	<b>Units</b>	<b>Benchmark value</b>	<b>Source</b>
pH	SU	6.0 – 9.0	2015 MSGP
Total Suspended Solids	mg/L	100	2015 MSGP
Oil and Grease	mg/L	15	2000 MSGP
Iron Total	mg/L	1.0	2015 MSGP

**B. Water Quality Standards (Basin Plan)**

<b>Parameter</b>	<b>Units</b>	<b>WQS value</b>	<b>Source</b>
pH	SU	6.5 – 8.5	Basin Plan

## Attachment 2: Table of Exceedances for Granite Rock Company Peninsula Concrete

Table containing each stormwater sampling result which exceeds EPA Benchmarks and/or causes or contributes to an exceedance of Basin Plan Water Quality Standards. The EPA Benchmarks and Basin Plan Water Quality Standards are listed in Attachment 1. All stormwater samples were reported by the Facility during the past five (5) years.

Reporting Period	Sample Location	Sample Date	Parameter	Result	Unit
2010-2011	East Gate	2/17/2011	Iron Total	5.4	mg/L
2010-2011	West Gate	2/17/2011	Iron Total	2.6	mg/L
2010-2011	East Gate	2/17/2011	pH	8.62	SU
2010-2011	West Gate	2/17/2011	pH	8.93	SU
2012-2013	East Gate	11/16/2012	Iron Total	21	mg/L
2012-2013	West Gate	11/16/2012	Iron Total	3.6	mg/L
2012-2013	East Gate	11/16/2012	pH	9.19	SU
2012-2013	West Gate	11/16/2012	pH	10.3	SU
2012-2013	East Gate	11/16/2012	Total Suspended Solids	420	mg/L
2012-2013	West Gate	11/16/2012	Total Suspended Solids	350	mg/L
2012-2013	East Gate	11/28/2012	pH	8.91	SU
2012-2013	West Gate	11/28/2012	pH	10.5	SU
2012-2013	East Gate	11/28/2012	Total Suspended Solids	160	mg/L
2012-2013	West Gate	11/28/2012	Total Suspended Solids	1700	mg/L
2013-2014	West Gate	2/26/2014	pH	9.53	SU
2013-2014	West Gate	2/26/2014	Total Suspended Solids	610	mg/L
2014-2015	East Gate	12/11/2014	Iron Total	14	mg/L
2014-2015	West Gate	12/11/2014	Iron Total	36	mg/L
2014-2015	East Gate	12/11/2014	pH	8.57	SU
2014-2015	West Gate	12/11/2014	pH	9.7	SU
2014-2015	East Gate	12/11/2014	Total Suspended Solids	550	mg/L
2014-2015	West Gate	12/11/2014	Total Suspended Solids	1500	mg/L
2014-2015	East Gate	2/6/2015	Iron Total	4.6	mg/L
2014-2015	West Gate	2/6/2015	Iron Total	20	mg/L
2014-2015	East Gate	2/6/2015	pH	9.37	SU
2014-2015	West Gate	2/6/2015	pH	9.76	SU
2014-2015	East Gate	2/6/2015	Total Suspended Solids	110	mg/L
2014-2015	West Gate	2/6/2015	Total Suspended Solids	240	mg/L

**Attachment 3: Alleged Dates of Exceedances by  
Granite Rock Company Peninsula Concrete,  
December 27, 2010 to November 23, 2015**

Days with precipitation one-tenth of an inch or greater, as reported by NOAA's National Climatic Data Center; Redwood City, California station, GHCND:US1CASM0008\* when a stormwater discharge from the Facility is likely to have occurred. <http://www.ncdc.noaa.gov/cdo-web/search>

2010	2011	2012	2013	2014	2015
12/29	1/2	1/21	1/6	2/3	2/7
	1/30*	1/23	1/24	2/6	2/8
	1/31*	2/14	2/8	2/8	2/9
	2/16	2/29	2/20	2/9	4/7
	2/17*	3/13	3/6	2/10	4/8
	2/18*	3/14	3/8	2/27	4/25
	2/19*	3/15	3/31	2/28	6/11
	2/20*	3/17	4/1	3/1	11/2
	2/25	3/25	4/4	3/6	11/3
	3/6	3/28	9/22	3/27	11/10
	3/14*	4/1	11/20	3/30	11/15
	3/16	4/11	11/21	4/1	
	3/19	4/12	12/7	4/2	
	3/20	4/13		4/4	
	3/22	4/26		4/26	
	3/23	6/5		9/25	
	3/24	10/22		10/25	
	3/25	10/23		11/1	
	3/26	10/24		11/13	
	3/27	11/1		11/21	
	4/7	11/9		12/1	
	4/14	11/17		12/2	
	5/15	11/18		12/3	
	6/1*	11/21		12/4	
	6/2*	11/29		12/6	
	6/4	11/30		12/11	
	6/29	12/1		12/12	
	10/4	12/2		12/13	
	10/5	12/3		12/15	
	10/6	12/13		12/16	
	11/4	12/16		12/17	
	11/6	12/22*		12/18	
	11/12	12/23*		12/20	
	11/20	12/24*		12/25	
		12/26*			
		12/27*			
		12/29			

\* Data reported by Foster City, California station, GHCND:US1CASM0006.



